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March 31, 2020

Via ECF

Hon. Vera M. Scanlon, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Writer's Information:

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Re. *Pagoada v. Hadar Geulah Inc., et al.*
Case No. 19 Civ. 6885 (DLI) (VMS)

Dear Judge Scanlon:

We represent Plaintiff Mirna Pagoada in this matter. Pursuant to the Order dated February 25, 2020 (ECF No. 19), Plaintiff is required to request a Certificate of Default against the remaining defendants Hadar Geular Inc. and Samuel Roth ("Defendants") by March 31, 2020. On March 12, 2020, Defendant Roth contacted our office asking for an extension of time to file an answer or otherwise response. Although we indicated to Defendant Roth that we would have no objection to the extension, he would need to contact the Clerk of the Court regarding the extension.

On May 16, 2020, Mr. Roth indicated that he did contact the Clerk of the Court. We are not sure what the outcome of that conversation was. Since this office has already agreed to the Defendants' request for extension of time until March 31, 2020, we respectfully ask the Court for an extension of time until April 15, 2020, to request a Certificate of Default if the Defendants fail to respond on or before March 31, 2020.

Thank you for Your Honor's anticipated consideration of this matter."

Respectfully submitted,

Jerry Boies, Esq.

cc: Hadar Geular Inc. and Samuel Roth via email